RECEIVED
OCT 1 8 2016
U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
CAPE GIRARDEAU

**UNITED STATES DISTRICT COURT**
**EASTERN DISTRICT OF MISSOURI**
**_______________ DIVISION**

Gabriel Alexander Pulliam )
_______________________________ )
_______________________________ )
(Enter above the full name of the Plaintiff(s) in this action. Include prison registration number(s).) )

v. )

Mississippi County Detention Center, Mike Borders, Terry Bolton, Ruth L. Turner, Nicole Dinks, Jodi Nelson, Gerald Henderson, Christie Turner )

(Enter above the full name of **ALL** Defendant(s) in this action. Fed. R. Civ. P. 10(a) requires that the caption of the complaint include the names of **all** the parties. Merely listing one party and "et al." is insufficient. Please attach additional sheets if necessary. )

1:16CV00254ACL

Case No. _______________
(To be assigned by Clerk)

**PRISONER CIVIL RIGHTS COMPLAINT UNDER 42 U.S.C. § 1983**

I. PLACE OF PRESENT CONFINEMENT:

Mississippi County Detention Center

II. PREVIOUS CIVIL ACTIONS:

A. Have you brought any other civil actions in state or federal court dealing with the same facts involved in this action or otherwise relating to your confinement?

YES [ ] NO [✓]

B. If your answer to "A" is YES, describe the action(s) in the space below. If there is more than one action, you must describe the additional action(s) on a separate piece of paper, using the same format as below.

1. Parties to previous civil action:

Plaintiff(s): ______________________________

______________________________

Defendant(s): ______________________________

______________________________

2. Court where filed: ______________________________

3. Docket or case number: ______________________________

4. Name of Judge: ______________________________

5. Basic claim made: ______________________________

______________________________

______________________________

6. Present disposition (Is the case still pending? Is it closed? If closed, was it appealed?):

______________________________

III. GRIEVANCE PROCEDURES:

A. Is there a prisoner grievance procedure at the institution in which you are incarcerated?

YES [✓] NO [ ]

B. Have you presented this grievance system the facts which are at issue in this complaint?

YES [✓] NO [ ]

C. If your answer to "B" is YES, what steps did you take: Wrote Several Narrative Grievances Explicitly describing Everything in Detail to Jail Administrator Mike Borders

D. If your answer to "B" is NO, explain why you have not used the grievance system:

IV. PARTIES TO THIS ACTION:

A. Plaintiff(s)

1. Name of Plaintiff: JaBriel Pulliam

2. Plaintiff's address: 525 Jefferson St Ste Genevieve MO 63670

3. Registration number:

4. Additional Plaintiff(s) and address(es):

B. Defendant(s)

1. Name of Defendant: Mike Borders Sheriffs Administrator

2. Defendant's address: 200 West Commercial St

3. Defendant's employer and job title: Mississippi County Detention Center

4. Additional Defendant(s) and address(es): Terry Hatton, Phillip Turner Nicole Sinks Jodi Gerald Henderson Nelson Christie Turner

V. COUNSEL

A. Do you have an attorney to represent you in this action?

YES [✓] NO [ ]

B. If your answer to "A" is NO, have you made an effort to contact an attorney to represent you in this matter?

YES [✓] NO [ ]

C. If your answer to "B" is YES, state the name(s) and address(es) of the attorneys you contacted and the results of those efforts:

Thaddeaus Brady 2480 East Main Street Jackson MO 63755 Thad@Beme LawFirm.COM

D. If your answer to "B" is NO, explain why you have not made such efforts:

E. Have you previously been represented by counsel in a civil action in this Court?

YES [ ] NO [✓]

F. If your answer to "E" is YES, state the attorney's name and address:

VI. Statement of claim (State as briefly as possible the facts of your case. Describe how each defendant is involved. You must state exactly what each defendant personally did, or failed to do, which resulted in harm to you. Include also the names of other persons involved, dates, and places. Be as specific as possible. State your claims in numbered paragraphs. You may use additional paper if necessary):

I was falsely Arrested By Charleston Police Department June 17th due to Phillip Turner's Son Stealing T-Shirts out of My Vehicle I was held on the Charge of A Felon with A Firearm for Nearly 30 days I wrote Several Grievances due to the Actions of Mike Borders and Gerald

I was granted Bond and My Felony was dropped My Bond was Revoked Twice After the State was Not Ready to Proceed on August 25th I was Made to come Back to the Mississippi County Detention Center After Pleading with Judge Scott Harmon Not to Send Me Back to the Facility where I had Written Several Complaints with Merit and at 4:12 PM Corrections Officer Jodi tazed Me Resulting in A Massive Head Injury He and Corrections Officer Nelson Shackled Me to the floor for No Apparent Reason. At 11:00 PM Corrections Officer ADAM and Emily Stripped Me Naked in the

VI. Statement of claim (State as briefly as possible the facts of your case. Describe how each defendant is involved. You must state exactly what each defendant personally did, or failed to do, which resulted in harm to you. Include also the names of other persons involved, dates, and places. Be as specific as possible. State your claims in numbered paragraphs. You may use additional paper if necessary):

Same Holding Cell 117 in an Attempt to Get the False Warrant they issued to Me under the Orders of Jail Administrator Mike Borders who Answered All of these Grievances and has Been the Catalyst to the Humiliation of Me Being Naked for Nearly 72 Hours and only Recieved Clothing After Emmitting A Substantial AMount of Water in My Cell After Being Exposed for 3 days. Mike Borders Lied in His Response

On August 26th I witnessed Corrections Officer Christie taze a woman seated and very Compliant the Woman just did Absolutely Not one thing and was Tazed from the Chair to the Floor I wrote A Grievance on the Matter and Jail Administrator Mike Borders Responded as if He was in the Booking Area which is A Lie and in Retaliation Officer Terry Hatton Threatens Me daily and does things such as follow My Person with the taser Sight Light

VI. Statement of claim (State as briefly as possible the facts of your case. Describe how each defendant is involved. You must state exactly what each defendant personally did, or failed to do, which resulted in harm to you. Include also the names of other persons involved, dates, and places. Be as specific as possible. State your claims in numbered paragraphs. You may use additional paper if necessary):

Jail Administrator Mike Borders has told
A Variety of False Statements and Has Attempted
to Coach his Staff on Topics that are Untrue
to justify My torture and the Violation of
All of My Civil Rights such as Going out
to Recreation. Phillip Turner denies Me to
Go Outside and He, Mike Borders and Jodi
have Actually Attempted to Pay Other
InMates to Assault Me and Corrections
Officer Nicole Sinks And Gerald
Have actually Instigated Several InMates
to engage in fist fights with Me and After
Infusing Violence would Advise Me to Lock
Down in A Jail full of UnLockable doors.
This Facility due to that One fact that the
doors can't Be Locked are UnABle to Keep
Anyone Safe. Plus the InMates Essentially
Run the Jail in Certain Pods. I've witnessed
Multiple InMates Assault A Single Man in

VI. Statement of claim (State as briefly as possible the facts of your case. Describe how each defendant is involved. You must state exactly what each defendant personally did, or failed to do, which resulted in harm to you. Include also the names of other persons involved, dates, and places. Be as specific as possible. State your claims in numbered paragraphs. You may use additional paper if necessary):

the Presence of Corrections Officers Adam and Corrections Officer Emily on September 13th at 11:20 PM and I truly Believe Staff will Kill or Let an InMate Be Killed. The Cameras will Show that Responses of Mike Borders are Callous and He is Making A Poor Attempt at Covering Up the Truth. I have Been Requesting to Speak to Sheriff Keith Moore since Being tazed and there are Nearly One dozen Grievances that He has Not tried to Follow the Format Read His Responses. I ask Jail Administrator Borders for Medical Attention After I Believed the Sheer weight of Corrections Officer Jodi and Nelson On top of Me Ripping Out the tazer Prongs Broke My Left Arm under the Elbow And My Left Leg Under the Knee it Has taken Me by Surprise How Much Pain these two joints Now Cause Me Every Moment of

VI. Statement of claim (State as briefly as possible the facts of your case. Describe how each defendant is involved. You must state exactly what each defendant personally did, or failed to do, which resulted in harm to you. Include also the names of other persons involved, dates, and places. Be as specific as possible. State your claims in numbered paragraphs. You may use additional paper if necessary):

Each and Everyday Both My Left Elbow and Knee are Swollen and I fear have grown Back Together Wrong and due to the Inability to get Professional Medical Care My Limbs will Never be the Same Ever Again No Matter what Type of Rehabilitation short of Rebreaking and Properly Setting them. I have Blank Spaces by Several of the Corrections Officers Names Because they don't wear any identification Name Badges and will Refuse to divulge that information even though they have Access to Sensitive Information Such as Addresses and Criminal History on September 23rd Corrections Officer Phillip Turner Sr actually Gave Me False Names to Several of the Staff Including Gerald And Christie where do Law Enforcement Lie About their identity to Avoid Responsibility Mike Borders and his Entire Staff are Corrupt and Control this facility as Criminal instead of Honestly

VI. Statement of claim (State as briefly as possible the facts of your case. Describe how each defendant is involved. You must state exactly what each defendant personally did, or failed to do, which resulted in harm to you. Include also the names of other persons involved, dates, and places. Be as specific as possible. State your claims in numbered paragraphs. You may use additional paper if necessary):

On September 23rd while filling out this Very Paperwork Corrections Officers Let Inmate Edward Lusk out of this facility Straight out the Door and Because they don't do Count didn't Realize that they Let the 66 year old Man Leave Until 6 PM Saturday Nearly 30+ Plus hours Later Corrections Officers Phillip Turner Sr Connie Conners and Others Actually Lied About their and Other Corrections Officers Identities Such As Gerald And Christie Lying Saying their Last Names were Henderson and Turner and His Name is Mike Jones! All the While letting A Fugitive walk out the front door And Lie to Everyone the Community the Local Media Outlets of Edward Lusk's Escape Saying the Senior Citizen Scaled the Ventilation which is Totally False. The Incompetence of this Staff is Dangerous for Inmates, the Community, the World. I Am Afraid of filling out A Grievance on this Matter too Dangerous!

VI. Statement of claim (State as briefly as possible the facts of your case. Describe how each defendant is involved. You must state exactly what each defendant personally did, or failed to do, which resulted in harm to you. Include also the names of other persons involved, dates, and places. Be as specific as possible. State your claims in numbered paragraphs. You may use additional paper if necessary):

On September 27th 2016 Corrections Officer Nelson was Arrested in this Facility for the Attempt to Bring Contraband into the Facility including Illegal Drugs! On September 28th Corrections Officer Todd After Being Informed of A Racial Tension And fight instead of diffusing the tension Instigated the fight in Spite of his Superiors despite their Attempts to follow Proper Protocol in Conflict Resolution. This Facilities Shortcomings, InAbility to House Inmates Safely, and Criminal Conduct Are More Evident Each And Every Instance Every Responded Grievance and Since Being Incarcerated the Staff HAs Refused to Release My Account Balance to Proceed in the Process of Filing this Civil Suit I Ask for My O from Phillip Turner, Monica, Connie Conners, Gerald, And Mike Borders As You can Probably Imagine from these Grievances Accompanying this form there is A Problem

VII. RELIEF

State briefly and exactly what you want the Court to do for you. Do not make legal arguments. (Note: If you are a **state** prisoner and you seek from this Court relief that affects the length or duration of your imprisonment, your case **must** be filed on a § 2254 form.)

I Own A Company Called GOD and Gentlemen this facility was instrumental in Revoking My Bond I was Incarcerated On My Closing date for My Store I was in this facility when My Lounge Made its Grand Opening at 903 Malone St Sikeston, MO

VIII. MONEY DAMAGES:

A) Do you claim either actual or punitive monetary damages for the acts alleged in this complaint?

YES ☑ NO ☐

B) If your answer to "A" is YES, state below the amount claimed and the reason or reasons you believe you are entitled to recover such money damages:

Missed Entire T-Shirt Season Brand is International Revenue in the Millions $273 Million for the Actual Suit will go as High as $203,520,000

IX. Do you claim that the wrongs alleged in the complaint are continuing to occur at the present time?

YES [✓] NO [ ]

G A Brian Pulliam

Signature of attorney or pro se Plaintiff(s)

9-23-2016

Date